IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

JIAXING SUPER LIGHTING ELECTRIC APPLIANCE CO., LTD. AND OBERT, INC.,	§	
Plaintiff,	§	
v.	§	Case. No. 6:22-CV-534
CURRENT LIGHTING SOLUTIONS, LLC d/b/a GE CURRENT,	§	
Defendants.	§	

DEFENDANT CURRENT LIGHTING SOLUTIONS, LLC d/b/a GE CURRENT'S
STIPULATION OF INVALIDITY CONTENTIONS

Defendant Current Lighting Solutions, LLC d/b/a GE Current ("Current Lighting") submits this stipulation of invalidity contentions.

Current Lighting filed the following petitions requesting *inter partes* review ("IPR") for each asserted patent and asserted claim in this action with the Patent Trial and Appeal Board. In each petition, Current Lighting identified itself as the real party-in-interest subject to 37 C.F.R §42.8(b)(1).

The petitions assert the following grounds of invalidity:

IPR Petition No.	Patent No.	IPR Ground	Basis	References	Challenged Claims
IPR2023-00269	10,560,989	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00271	10,295,125	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00272	10,830,397	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00270	9,723,662	[ADD]	[ADD]	[ADD]	[ADD]

IPR Petition No.	Patent No.	IPR Ground	Basis	References	Challenged Claims
IPR2023-00675	10,897,801	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00676	9,939,140	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00979	11,112,068	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00980	9,945,520	[ADD]	[ADD]	[ADD]	[ADD]
IPR2023-00984	9,841,174	[ADD]	[ADD]	[ADD]	[ADD]

Current Lighting hereby stipulates that, if the Patent Trial and Appeal Board ("PTAB") institutes IPR on any of the listed petitions, then Current Lighting will not pursue the same grounds or any grounds that reasonably could have been raised before the PTAB for the patent against which they are instituted.

This stipulation is not intended, and should not be construed, to limit Current Lighting's ability to assert invalidity of the claims being challenged in Current Lighting's IPRs on any other ground, including any other ground that could be raised under §§102 or 103 (e.g., on the basis of prior art other than patents and printed publications), and §§101 and 112.

Dated: TBD

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

/s/ ***DRAFT***

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CERTIFICATE OF SERVICE

I certify that on TBD, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ ***DRAFT***
[**DRAFT**]